

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

| | | |
|---|---|---------------------------|
| In the Matter of |) | |
| |) | |
| Schools and Libraries Universal Service |) | CC Docket No. 02-6 |
| Support Mechanism |) | |
| |) | |
| Request for Review of a Decision of the |) | Application No. 171045096 |
| Universal Service Administrator by the |) | |
| |) | |
| Amboy Community Unit School |) | |
| District 272 |) | |
| |) | |
| and |) | |
| |) | |
| Single Path, LLC |) | |

**JOINT REQUEST OF SINGLE PATH, LLC AND AMBOY COMMUNITY UNIT SCHOOL DISTRICT
FOR REVIEW OF A DECISION OF THE UNIVERSAL SERVICE ADMINISTRATIVE COMPANY**

Pursuant to sections 54.719(b) and 54.722 of the Commission’s rules,¹ Single Path, LLC (“Single Path”) and Amboy Community Unit School District 272 (“Amboy SD” or “School District” and, together with Single Path,” the “Parties”) hereby respectfully request that the

¹ 47 C.F.R. § 54.719(b); 47 CFR § 54.722. Amboy SD’s Request for Review was denied by USAC as untimely because it was filed approximately eight days after the 60-day period established under Section 54.719(a) for appealing USAC’s issuance of the Form 486 Notification Letter had expired. To the extent that Section 54.719(a) filing deadline remains relevant to the Bureau’s consideration of this *de novo* Request for Review filed under Section 54.719(b), the Parties request a waiver of Section 54.719(a) of the Commission’s rules, 47 C.F.R. § 54.719(a). The Form 486 Notification Letter was issued on July 18, 2018, after the Amboy SD had closed for the summer. Amboy SD received actual notice of the funding reduction when the school reopened in September 2018, mistakenly relied on a June 30, 2018 FY 2016 Request for Erroneously Disbursed Funds in believing that it had met the 60 day appeal and filed its Request for Review with USAC within a reasonable time thereafter. *See Requests for Review and/or Waiver of Decisions of the Universal Service Administrator by ABC Unified School District et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, DA 11-1332, 26 FCC Rcd 11019 (Wir. Comp. Bur. 2011) at ¶ 2 (waiving the appeal deadline where petitioners submitted their appeals to the Commission within a reasonable period of time after receiving actual notice of USAC’s adverse decision) (“*ABC Unified Order*”); *see also Requests for Waiver and Review of the Decisions of the Universal Service Administrator by Acorn Public Library, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-637819, *et al.*, CC Docket No. 02-6, Order, DA 08-2376, 23 FCC Rcd 15474 (Wireline Comp. Bur. 2008), at ¶ 5 (“*Acorn Public Library Order*”) (granting waiver of FCC Form 471 filing deadline where the filing was made within 14 days of the due date).

Wireline Competition Bureau (“Bureau”) conduct a *de novo* review of this appeal of a funding reduction notice issued by the Schools and Libraries Division (“SLD”) of the Universal Service Administrative Company (“USAC”), through the issuance of a FY2017 Revised Funding Commitment Decision Letter (FY2017 RFCDL), dated October 8, 2018.² The Parties request that the Bureau direct USAC to accept the applicant’s late-filed FY2017 Form 486 and increase its funding commitments funding for the subject requests to cover the full period for which the services were delivered, in accordance with the standard the Commission articulated in its *Archdiocese of New Orleans Order*.³

I. Background

In FY2017, Single Path was the service provider to the Amboy SD for WAN Services (FRN 1799102995). On May 11, 2017, Amboy SD filed and certified its Form 471, seeking \$28,140.00 in reimbursement for WAN Services.⁴ On July 28, 2017, USAC issued a positive Funding Commitment Decision Letter approving the requested amount for the WAN FRN as submitted.

² See Attachment A, FY2017 RFCDL.

³ *Requests for Waiver of Decisions of the Universal Service Administrator by Archdiocese of New Orleans, Louisiana et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 31 FCC Rcd 11747, para. 10 (WCB 2016) (*Archdiocese of New Orleans Order*). The Parties recognize that the Commission finds the FCC Form 486 Deadline to be procedural in nature and, thus, requires appeals to be filed in the first instance directly with USAC. See, e.g., *Request for Review of a Decision of the Universal Service Administrator by La Canada Unified School District; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 30 FCC Rcd 4729, 4729, para. 2 (WCB 2015) (*La Canada Unified School District Order*) (dismissing an appeal that properly belongs before USAC pursuant to Commission rules). As shown in Attachment A, USAC has rejected an appeal of this decision as untimely. Because the Form 486 filing deadline is established by USAC, no waiver of the Commission’s rules or orders is necessary. See *Archdiocese of New Orleans Order* at ¶ 4, n.10.

⁴ Attachment B, FY2017 Form 471 for Amboy SD, dated May 11, 2017.

Due to a change in personnel responsible for E-rate at Amboy SD and lack of familiarity with the newly launched EPC portal that made notices more difficult to understand, find and decipher, Amboy SD filed its Form 486 late.⁵ Under USAC’s procedural rules, the FCC Form 486 was due 120 days after July 28, 2017. Amboy SD only became aware of this after the 120-day deadline had passed through communication from its service provider, Single Path, whereupon, they immediately filed the Form 486 on July 11, 2018.⁶

On July 18, 2018, USAC issued the FCC Form 486 Notification Letter informing Amboy SD of the 120 day rule violation and adjusting the approval service start date from July 1, 2017 to March 13, 2018.⁷ Amboy SD appealed this decision with USAC on September 25, 2018—only 8 days after the 60-day appeal deadline had expired.⁸ The District explained that the reason for the late filing was due to turnover in District leadership and subsequent changes in roles and responsibilities within the organization, including individuals responsible for E-rate, relying upon a date related to a FY2016 USAC Recovery for Improperly Disbursed Funds Letter, dated June 30, 2018.

As a result of turnover in School District personnel and associated changes in roles and responsibilities, E-rate updates and timeline notifications were not being received and access to the EPC Portal was difficult at best.⁹ On October 8, USAC issued the FY2017 RFCDL denying the appeal as untimely and affirming the reduction in funding from the original 12 months to

⁵ See Public Notice, CC Docket No. 02-6, WC Docket No. 06-122, “Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company,” DA 17-279, 32 FCC Rcd 1989 (Wir. Comp. Bur. 2017) at 3 (granting late-filed Form 486 waiver request as a result of change of personnel in Lexington County School District One, SC, Application No. 1051214).

⁶ Attachment C, Amboy SD FY2017 Form 486, dated March 13, 2018.

⁷ Attachment D, USAC FCC Form 486 Notification Letter, dated July 18, 2018.

⁸ Attachment E, Amboy SD Appeal to USAC on 486 120-Day Violation, dated Sept. 25, 2018.

⁹ Attachment E, Amboy SD Appeal to USAC on 486 120-Day Violation, dated Sept. 25, 2018.

fewer than four months, as set forth in the Form 486 Notification Letter.¹⁰ The Parties were befuddled by USAC’s finding that the appeal was untimely and reviewed the documentation that was submitted for the original USAC appeal. Only at that point did the School District realize it had mistakenly calculated the deadline for filing its appeal at USAC using the date of an unrelated USAC Notice of Improperly Disbursed Funds issued to Single Path on July 30, 2018 for FY2016,¹¹ rather than the date of the actual FY2017 USAC Form 486 Notification Letter. Until that point, the School District believed that its FCC Form 486 filing was timely filed.

II. Discussion

In 2016, in light of the new invoice rules, the Commission revisited its standard for granting late-filed 486 appeals in the landmark *Alaska Gateway Order*.¹² Specifically, the Commission clarified that “absent extraordinary circumstances, we will only grant relief for late-filed Forms 486 that were filed no later than 120 days after the last day to receive service for the funding request at issue and the applicants have demonstrated good cause for the late filing.”¹³

The School District meets the revised standard established by the *Archdiocese of New Orleans Order*. First, it filed its Form 486 on July 11, 2018. That date is well in advance of the ultimate deadline established in *Archdiocese of New Orleans*, which was 120 days after the last date to receive service (*i.e.*, for FY2017, 120 days after June 30, 2018).

Second, the Amboy SD unquestionably faced extraordinary services in this case. Changes in the School District leadership and turnover of E-rate roles and responsibilities

¹⁰ See Attachment A, FY2017 RFCDL.

¹¹ Attachment F – Single Path Recovery of Improperly Disbursed Funds, dated July 30, 2018.

¹² *Requests for Review and Waiver of the Decision of the Universal Service Administrator by Alaska Gateway School District et al; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 21 FCC Rcd 10182 (Wir. Comp. Bur. 2006), at ¶ 8 (“*Alaska Gateway Order*”).

¹³ *Archdiocese of New Orleans Order*, para. 10.

created ongoing confusion. As a result, there was no knowledgeable employee with clear responsibility for filing the Form 486 when it was due, and it simply fell through the resulting cracks and gaps in the School District's administrative structure.

Such shifts can be particularly fraught for a small school district such as the Amboy SD. As the Commission has correctly recognized on multiple occasions, “the primary jobs of most of the people filling out these forms include school administrators, technology coordinators, and teachers, and the majority of their time is not dedicated to pursuing federal support, especially in small school districts. [citation omitted]. Even when a school official has learned how to correctly navigate the E-rate application process, unexpected events may cause unanticipated delays Furthermore, for the certifications that were filed late in these cases, we find that rigid adherence to filing procedures does not further the purposes of section 254(h) of the Act or serve the public interest.”¹⁴

Despite these challenges, the Form 486 was filed well in advance of the ultimate deadline established by the *Archdiocese of New Orleans Order*, ensuring that the late filing nevertheless would not have a material impact on the administration of the E-rate mechanism.¹⁵ Here, in establishing the outer permissible boundary of the Form 486 late-filing period as 120 days after

¹⁴ *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, FCC 10-122, 25 FCC Rcd 9256 (2010), at ¶ 9 (“*Academy of Math and Science Order*”), citing *Request for Review of the Decision of the Universal Service Administrator by Bishop Perry Middle School, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-487170, et al., CC Docket No. 02-6, Order, FC 06-54, 21 FCC Rcd 5316 (2006), at ¶ 9 (“*Bishop Perry Order*”).

¹⁵ See *Academy of Math and Science Order* at ¶ 9 (granting a waiver of the Form 471 deadline where medical issues had prevented the timely filing of the form and the school had nevertheless filed it “close enough to the deadline so as not to impair the administration of the program”).

the last day to receive service, the Bureau has already determined that such timing is consistent with orderly administration of the E-rate mechanism.¹⁶

Nor is it consistent with precedent to require the Applicant to maintain a staff of fully-trained backup employees who are ready to step in on a moment's notice in the event of a failure of the E-rate lead to perform his or her duties, or redundantly monitor the Applicant's compliance with program deadlines. As the Commission explained in the *Acorn Public Library Order*, for example, "especially in small districts . . . , it would be an undue hardship to expect small applicants to train multiple staff members to handle E-rate filings in anticipation of unexpected absences due to illness and death, unless such absences should have been foreseeable."¹⁷ The turnover of E-rate roles and responsibilities, even if not due to illness or death, is similarly impactful, in that it substitutes new and inexperienced employees for those who had formerly gained E-rate expertise and a detailed understanding of the status and posture of the applicant's funding requests.


III. Conclusion

For the foregoing reasons, the Parties respectfully request the Bureau to direct USAC to accept the applicant's late-filed FY2017 Form 486 and increase its funding commitments funding for the subject requests to cover the full period for which the services were delivered, in accordance with the standard the Commission articulated in its *Archdiocese of New Orleans Order*.


¹⁶ *Archdiocese of New Orleans Order* at ¶ 10 (finding that this deadline does not "frustrate the timely submission and payment of invoices," but rather "ensures that the invoicing process is not delayed by tardy FCC Forms 486").

¹⁷ *Acorn Public Library Order* at ¶ 8 (finding special circumstances exist to grant extra time for filing the Form 471, where petitioners were late due to circumstances beyond their control); *see also Requests for Waiver and Review of Decisions of the Universal Service Administrator by A Special Place; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order and Order on Reconsideration, 29 FCC Rcd 5827 (Wir. Comp. Bur. 2014), at ¶ 1; *ABC Unified Order* at ¶ 2 (waiving invoice deadline where it was missed due to circumstances beyond the applicants' control)

Respectfully submitted,



Bill Spakowski
Director of Education
Single Path, LLC
905 Parkview Blvd.
Lombard, IL 60148



Joshua Nichols
Superintendent of Schools
Amboy Community Unit School District 272
11 E. Hawley Street
Amboy, IL 60310

December 6, 2018

ATTACHMENT A

Revised Funding Commitment Decision Letter

Funding Year 2017

Contact Information:

Amie Wiseman
AMBOY COMM UNIT SCH DIST 272
11 E HAWLEY ST
AMBOY, IL 61310
awiseman@amboy.net

BEN: 135982**Post Commitment Wave:** 30

Totals

| | |
|----------------------------------|--------------------|
| Original Commitment Amount | \$51,300.00 |
| Revised Commitment Amount | \$17,100.00 |

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2017 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- Appeals
- Appeals
- Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).



BEN Name: AMBOY COMM UNIT SCH DIST 272

BEN: 135982

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- o **If USAC approved funding on an FRN in your original FCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
 - o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
- **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
 - **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
 - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time**, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC**, visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.
- **To request a waiver of the FCC's rules or appeal USAC's appeal decision**, please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System](#) (ECFS). Include your contact information, a statement that your filing is a waiver request,



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identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



BEN Name: AMBOY COMM UNIT SCH DIST 272

BEN: 135982

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Revised Funding Commitment Decision Overview

Funding Year 2017

| Funding Request Number (FRN) | Service Provider Name | Request Type | Revised Committed | Review Status |
|------------------------------|--------------------------------|--------------|-------------------|---------------|
| 1799103030 | Frontier North, Inc. | Appeals | \$440.00 | Denied |
| 1799102995 | Single Path LLC | Appeals | \$9,380.00 | Denied |
| 1799102970 | Illinois Fiber Resources Group | Appeals | \$7,280.00 | Denied |



BEN Name: AMBOY COMM UNIT SCH DIST 272

BEN: 135982

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| | | |
|--|---|--|
| Post Commitment Request Number: 123779 | Post Commitment Request Type: Appeals | Post Commitment Decision: Denied |
|--|---|--|

| | | | |
|--------------------------------|-------------------------------|-----------------------------------|----------------------------------|
| FRN: 1799103030 | Service Type: Voice | Original Status: Funded | Revised Status: Funded |
| FCC Form 471: 171045096 | | | |

| Dollars Committed | | | |
|----------------------------------|------------|---------------------------------|--------|
| Monthly Cost | | One-Time Cost | |
| Months of Service | 4 | | |
| Total Eligible Recurring Charges | \$4,400.00 | Total Eligible One Time Charges | \$0.00 |
| Total Pre-Discount Charges | | \$4,400.00 | |
| Discount Rate | | 10.00% | |
| Revised Committed Amount | | \$440.00 | |

| Dates | | Service Provider and Contract Information | |
|----------------------------------|-----------|---|----------------------|
| Service Start Date | 3/13/2018 | Service Provider | Frontier North, Inc. |
| Contract Expiration Date | 6/30/2018 | SPIN (498ID) | 143004791 |
| Contract Award Date | | Contract Number | |
| Service Delivery Deadline | 6/30/2018 | Account Number | |
| Expiration Date (All Extensions) | | Establishing FCC Form 470 | 170082130 |

| Consultant Information | |
|------------------------|--|
| Consultant Name | |
| Consultant's Employer | |
| CRN | |

| |
|--|
| Revised Funding Commitment Decision Comments: |
|--|

| |
|-----------------------------------|
| Post Commitment Rationale: |
|-----------------------------------|

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 9/25/2018. The Form 486 Notification Letter was issued on 7/18/2018. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.



BEN Name: AMBOY COMM UNIT SCH DIST 272

BEN: 135982

Post Commitment Wave: 30

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|--|---|--|
| Post Commitment Request Number: 123779 | Post Commitment Request Type: Appeals | Post Commitment Decision: Denied |
|--|---|--|

| | | | |
|--------------------------------|--|-----------------------------------|----------------------------------|
| FRN: 1799102995 | Service Type: Data Transmission and/or Internet Access | Original Status: Funded | Revised Status: Funded |
| FCC Form 471: 171045096 | | | |

| Dollars Committed | | | |
|----------------------------------|-------------|---------------------------------|--------|
| Monthly Cost | | One-Time Cost | |
| Months of Service | 4 | | |
| Total Eligible Recurring Charges | \$13,400.00 | Total Eligible One Time Charges | \$0.00 |
| Total Pre-Discount Charges | | \$13,400.00 | |
| Discount Rate | | 70.00% | |
| Revised Committed Amount | | \$9,380.00 | |

| Dates | | Service Provider and Contract Information | |
|----------------------------------|-----------|---|-----------------|
| Service Start Date | 3/13/2018 | Service Provider | Single Path LLC |
| Contract Expiration Date | 6/30/2018 | SPIN (498ID) | 143030968 |
| Contract Award Date | | Contract Number | |
| Service Delivery Deadline | 6/30/2018 | Account Number | |
| Expiration Date (All Extensions) | | Establishing FCC Form 470 | 170082130 |

| Consultant Information | |
|------------------------|--|
| Consultant Name | |
| Consultant's Employer | |
| CRN | |

| |
|--|
| Revised Funding Commitment Decision Comments: |
|--|

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|-----------------------------------|
| Post Commitment Rationale: |
|-----------------------------------|

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 9/25/2018. The Form 486 Notification Letter was issued on 7/18/2018. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.



BEN Name: AMBOY COMM UNIT SCH DIST 272

BEN: 135982

Post Commitment Wave: 30

| | | |
|--|---|--|
| Post Commitment Request Number: 123779 | Post Commitment Request Type: Appeals | Post Commitment Decision: Denied |
|--|---|--|

| | | | |
|--------------------------------|---|-----------------------------------|----------------------------------|
| FRN: 1799102970 | Service Type: Data Transmission and/or Internet Access | Original Status: Funded | Revised Status: Funded |
| FCC Form 471: 171045096 | | | |

| Dollars Committed | | | |
|----------------------------------|-------------|---------------------------------|--------|
| Monthly Cost | | One-Time Cost | |
| Months of Service | 4 | | |
| Total Eligible Recurring Charges | \$10,400.00 | Total Eligible One Time Charges | \$0.00 |
| Total Pre-Discount Charges | | \$10,400.00 | |
| Discount Rate | | 70.00% | |
| Revised Committed Amount | | \$7,280.00 | |

| Dates | |
|----------------------------------|-----------|
| Service Start Date | 3/13/2018 |
| Contract Expiration Date | 6/30/2018 |
| Contract Award Date | |
| Service Delivery Deadline | 6/30/2018 |
| Expiration Date (All Extensions) | |

| Service Provider and Contract Information | |
|---|-----------------------------------|
| Service Provider | Illinois Fiber Resources Group |
| SPIN (498ID) | 143035593 |
| Contract Number | |
| Account Number | |
| Establishing FCC Form 470 | 170082130 |

| Consultant Information | |
|------------------------|--|
| Consultant Name | |
| Consultant's Employer | |
| CRN | |

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|--|
| Revised Funding Commitment Decision Comments: |
|--|

| |
|-----------------------------------|
| Post Commitment Rationale: |
|-----------------------------------|

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 9/25/2018. The Form 486 Notification Letter was issued on 7/18/2018. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

ATTACHMENT B



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

| | | | |
|---------------------|------------|----------------------------|------------|
| Nickname | 2017-18 P1 | Application Number | 171045096 |
| Funding Year | 2017 | Category of Service | Category 1 |

Billed Entity

AMBOY COMM UNIT SCH DIST 272
11 E HAWLEY ST AMBOY IL 61310 - 1103
815-857-2164

Contact Information

Amie Wiseman
815-857-2164
awiseman@amboy.net

Billed Entity Number 135982
FCC Registration Number 0012015640
Applicant Type School District

Entity Information

School District Entity - Details

| BEN | Name | Urban/ Rural | State LEA ID | State School ID | NCES Code | School District Attributes | Endowment |
|--------|---------------------------------|-----------------|-----------------|-----------------------|--------------|-------------------------------|-----------|
| 135982 | AMBOY COMM UNIT SCH DIST 272 | Rural | | | | Public School District | None |

Related Entity Information

Related Child School Entity - Details

| BEN | Name | Urban/ Rural | State LEA ID | State School ID | NCES Code | Alternative Discount | School Attributes | Endowment |
|-------|------------------------------|-----------------|-----------------|--------------------|-----------|-------------------------|-------------------|-----------|
| 71639 | AMBOY HIGH SCHOOL | Rural | | | | | | None |
| 71640 | AMBOY CENTRAL ELEM SCHOOL | Rural | | | | | | None |
| 71641 | AMBOY JUNIOR HIGH SCHOOL | Rural | | | | | | None |

Related Child School Entity - Discount Rate Calculation Details

| BEN | Name | Urban/ Rural | Number of Students | Students Count Based on Estimate | CEP Percentage |
|-------|---------------------------|-----------------|-----------------------|--|-------------------|
| 71639 | AMBOY HIGH SCHOOL | Rural | 0 | N/A | |
| 71640 | AMBOY CENTRAL ELEM SCHOOL | Rural | 0 | N/A | |
| 71641 | AMBOY JUNIOR HIGH SCHOOL | Rural | 0 | N/A | |

Discount Rate

| School District Enrollment | School District NSLP Count | School District NSLP Percentage | School District Urban/ Rural Status | Category One Discount Rate | Category Two Discount Rate | Voice Discount Rate |
|----------------------------|----------------------------|---------------------------------|--|----------------------------|----------------------------|---------------------|
| 691 | 294 | 43.0% | Rural | 70% | 70% | 10% |

Funding Request for FRN #1799102970

Funding Request Nickname: Internet Access

Service Type: Data Transmission and/or Internet Access

Agreement Information - Month-to-Month

Establishing FCC Form 470 170082130

Account Number

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Service Provider Illinois Fiber Resources Group (SPN: 143035593)

How many bids were received for this contract? 3

When will the services end? June 30, 2018

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative Internet and Data Transport for School District Students and Staff

Line Item # 1799102970.001

Product and Service Details

| | | | |
|---------------------------|--|-----------------------|------------|
| Purpose | Internet access service that includes a connection from any applicant site directly to the Internet Service Provider | | |
| Function | Fiber | | |
| Type of Connection | Ethernet | | |
| Bandwidth Speed | | | |
| Upload Speed | 250.0 Mbps | Download Speed | 250.0 Mbps |

Connection Information

| | | | |
|--|----|--|-----|
| Does this include firewall services? | No | Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)? | Yes |
| Is this a direct connection to a single school, library or a NIF for Internet access? | No | | |

Cost Calculation for FRN Line Item # 1799102970.001

| | | | |
|---|---------------|--|---------------|
| Monthly Cost | | One-Time Cost | |
| Monthly Recurring Unit Cost | \$2,600.00 | One-time Unit Cost | \$0.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$0.00 |
| Monthly Recurring Unit Eligible Costs | = \$2,600.00 | One-time Eligible Unit Cost | = \$0.00 |
| Monthly Quantity | x 1 | One-time Quantity | x 0 |
| Total Monthly Eligible Recurring Costs | = \$2,600.00 | Total Eligible One-time Costs | = \$0.00 |
| Months of Service | x 12 | Summary | |
| Total Eligible Recurring Costs | = \$31,200.00 | Total Eligible Recurring Costs | \$31,200.00 |
| | | Total Eligible One-time Costs | + \$0.00 |
| | | Pre-Discout Extended Eligible Line Item Cost | = \$31,200.00 |

Recipients of Services

| BEN | Name |
|-------|---------------------------|
| 71639 | AMBOY HIGH SCHOOL |
| 71640 | AMBOY CENTRAL ELEM SCHOOL |
| 71641 | AMBOY JUNIOR HIGH SCHOOL |

FRN Calculation for FRN #1799102970

| Monthly Charges | |
|---|---------------|
| Total Monthly Recurring Charges | \$2,600.00 |
| Total Monthly Ineligible Charges | - \$0.00 |
| Total Monthly Eligible Charges | = \$2,600.00 |
| Total Number of Months of Service | x 12 |
| Total Eligible Pre-Discount Recurring Charges | = \$31,200.00 |

| One-Time Charges | |
|--|----------|
| Total One-Time Charges | \$0.00 |
| Total Ineligible One-Time Charges | - \$0.00 |
| Total Eligible Pre-Discount One-Time Charges | = \$0.00 |

| Total Requested Amount | |
|---|---------------|
| Total Eligible Pre-Discount Recurring Charges | \$31,200.00 |
| Total Eligible Pre-Discount One-Time Charges | + \$0.00 |
| Total Pre-Discount Charges | = \$31,200.00 |
| Discount Rate | 70% |
| Funding Commitment Request | = \$21,840.00 |

Funding Request for FRN #1799102995

Funding Request Nickname: WAN Services

Service Type: Data Transmission and/or Internet Access

Agreement Information - Month-to-Month

Establishing FCC Form 470 170082130

Account Number

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Service Provider Single Path LLC (SPN: 143030968)

How many bids were received for this contract? 2

When will the services end? June 30, 2018

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative WAN Services

Line Item # 1799102995.001

Product and Service Details

| | | | |
|--------------------|--|----------------|------------|
| Purpose | Internet access service that includes a connection from any applicant site directly to the Internet Service Provider | | |
| Function | Miscellaneous | | |
| Type of Connection | Maintenance and Technical Support | | |
| Bandwidth Speed | | | |
| Upload Speed | 250.0 Mbps | Download Speed | 250.0 Mbps |

Connection Information

| | | | |
|---|-----|---|-----|
| Does this include firewall services? | Yes | Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)? | Yes |
| Is this a direct connection to a single school, library or a NIF for Internet access? | No | | |

Cost Calculation for FRN Line Item # 1799102995.001

| | | | |
|---|---------------|--|---------------|
| Monthly Cost | | One-Time Cost | |
| Monthly Recurring Unit Cost | \$3,350.00 | One-time Unit Cost | \$0.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 | One-time Ineligible Unit Costs | - \$0.00 |
| Monthly Recurring Unit Eligible Costs | = \$3,350.00 | One-time Eligible Unit Cost | = \$0.00 |
| Monthly Quantity | x 1 | One-time Quantity | x 0 |
| Total Monthly Eligible Recurring Costs | = \$3,350.00 | Total Eligible One-time Costs | = \$0.00 |
| Months of Service | x 12 | Summary | |
| Total Eligible Recurring Costs | = \$40,200.00 | Total Eligible Recurring Costs | \$40,200.00 |
| | | Total Eligible One-time Costs | + \$0.00 |
| | | Pre-Discout Extended Eligible Line Item Cost | = \$40,200.00 |

Recipients of Services

| BEN | Name |
|-------|---------------------------|
| 71639 | AMBOY HIGH SCHOOL |
| 71640 | AMBOY CENTRAL ELEM SCHOOL |
| 71641 | AMBOY JUNIOR HIGH SCHOOL |

FRN Calculation for FRN #1799102995

| Monthly Charges | |
|---|---------------|
| Total Monthly Recurring Charges | \$3,350.00 |
| Total Monthly Ineligible Charges | - \$0.00 |
| Total Monthly Eligible Charges | = \$3,350.00 |
| Total Number of Months of Service | x 12 |
| Total Eligible Pre-Discount Recurring Charges | = \$40,200.00 |

| One-Time Charges | |
|--|----------|
| Total One-Time Charges | \$0.00 |
| Total Ineligible One-Time Charges | - \$0.00 |
| Total Eligible Pre-Discount One-Time Charges | = \$0.00 |

| Total Requested Amount | |
|---|---------------|
| Total Eligible Pre-Discount Recurring Charges | \$40,200.00 |
| Total Eligible Pre-Discount One-Time Charges | + \$0.00 |
| Total Pre-Discount Charges | = \$40,200.00 |
| Discount Rate | 70% |
| Funding Commitment Request | = \$28,140.00 |

Funding Request for FRN #1799103030

Funding Request Nickname: Phone Service

Service Type: Voice

Agreement Information - Month-to-Month

Establishing FCC Form 470 170082130

Account Number

Was an FCC Form 470 posted Yes
for the product and/or services
you are requesting?

Service Provider Frontier North, Inc. (SPN:
143004791)

When will the services end? June 30, 2018

How many bids were received 1
for this contract?

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits No
publication of the specific pricing information for this contract?

Narrative District Phone service

Line Item # 1799103030.001

Product and Service Details

| | |
|--------------------|-----------------------------|
| Function | Voice |
| Type of Connection | Local/Long Distance Service |

Cost Calculation for FRN Line Item # 1799103030.001

| Monthly Cost | |
|---|---------------|
| Monthly Recurring Unit Cost | \$1,100.00 |
| Monthly Recurring Unit Ineligible Costs | - \$0.00 |
| Monthly Recurring Unit Eligible Costs | = \$1,100.00 |
| Monthly Quantity | x 1 |
| Total Monthly Eligible Recurring Costs | = \$1,100.00 |
| Months of Service | x 12 |
| Total Eligible Recurring Costs | = \$13,200.00 |
| | |

| One-Time Cost | |
|--|---------------|
| One-time Unit Cost | \$0.00 |
| One-time Ineligible Unit Costs | - \$0.00 |
| One-time Eligible Unit Cost | = \$0.00 |
| One-time Quantity | x 0 |
| Total Eligible One-time Costs | = \$0.00 |
| Summary | |
| Total Eligible Recurring Costs | \$13,200.00 |
| Total Eligible One-time Costs | + \$0.00 |
| Pre-Discout Extended Eligible Line Item Cost | = \$13,200.00 |

Recipients of Services

| BEN | Name |
|-------|---------------------------|
| 71639 | AMBOY HIGH SCHOOL |
| 71640 | AMBOY CENTRAL ELEM SCHOOL |
| 71641 | AMBOY JUNIOR HIGH SCHOOL |

FRN Calculation for FRN #1799103030

| Monthly Charges | |
|---|---------------|
| Total Monthly Recurring Charges | \$1,100.00 |
| Total Monthly Ineligible Charges | - \$0.00 |
| Total Monthly Eligible Charges | = \$1,100.00 |
| Total Number of Months of Service | x 12 |
| Total Eligible Pre-Discount Recurring Charges | = \$13,200.00 |

| One-Time Charges | |
|--|----------|
| Total One-Time Charges | \$0.00 |
| Total Ineligible One-Time Charges | - \$0.00 |
| Total Eligible Pre-Discount One-Time Charges | = \$0.00 |

| Total Requested Amount | |
|---|---------------|
| Total Eligible Pre-Discount Recurring Charges | \$13,200.00 |
| Total Eligible Pre-Discount One-Time Charges | + \$0.00 |
| Total Pre-Discount Charges | = \$13,200.00 |
| Discount Rate | 10% |
| Funding Commitment Request | = \$1,320.00 |

Connectivity Questions

District/System-wide Internet Access Questions

Does your school district currently aggregate Internet access for the entire district(as opposed to buying Internet access on a building-by-building basis)? Yes

| | | | |
|----------------|--------|----------------------|------|
| Download Speed | 250.00 | Download Speed Units | Mbps |
| Upload Speed | 250.00 | Upload Speed Units | Mbps |

Per Entity Basis Questions

Entity Name AMBOY COMM UNIT SCH DIST 272 Entity Number 135982

| BEN | Entity Name | Download | Units | Upload | Units | Connection | Wifi Sufficient | Barriers to Robust Network |
|-------|---------------------------|----------|-------|--------|-------|------------|-----------------|----------------------------|
| 71639 | AMBOY HIGH SCHOOL | 250.00 | Mbps | 250.00 | Mbps | Fiber | Completely | No barriers |
| 71640 | AMBOY CENTRAL ELEM SCHOOL | 250.00 | Mbps | 250.00 | Mbps | Fiber | Completely | No barriers |
| 71641 | AMBOY JUNIOR HIGH SCHOOL | 250.00 | Mbps | 250.00 | Mbps | Fiber | Completely | No barriers |

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

| Summary | |
|---|--------------|
| Total funding year pre-discount eligible amount on this FCC Form 471 | \$84,600.00 |
| Total funding commitment request amount on this FCC Form 471 | \$51,300.00 |
| Total applicant non-discount share of the eligible amount | \$33,300.00 |
| Total budgeted amount allocated to resources not eligible for E-rate support | \$100,000.00 |
| Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts | \$133,300.00 |
| Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year? | No |
| Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share? | No |

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471

except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

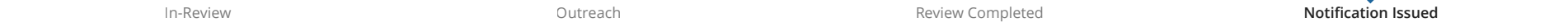
| | | | |
|-----------------|--------------------------------------|------------------|--------------------|
| Title: | District iCoach | Name: | Amie Wiseman |
| Phone: | 815-857-2164 | Email: | awiseman@amboy.net |
| Address: | 11 E HAWLEY ST AMBOY IL 61310 - 1103 | Employer: | Amie Wiseman |

Certified Timestamp 11-May-2017 09:48:13 EDT

ATTACHMENT C

2017-2018 486 - #114614

- Summary
- Associated FRNs
- Review Inquiries
- News
- Related Actions



FCC Form 486 Form Details

View Status (+)

Funding Year 2017

Submitting Organization AMBOY COMM UNIT SCH DIST 272 (BEN: 135982)

Created By Amie Wiseman

Created On 7/11/2018 2:01 PM EDT

Billed Entity Information

AMBOY COMM UNIT SCH DIST 272
11 E HAWLEY ST
AMBOY, IL 61310
815-857-2164

Billed Entity Number: 135982
FCC Registration Number: 0012015640
Applicant Type: School District

Main Contact

Name Amie Wiseman
Phone Number 815-857-2164

Email awiseman@amboy.net

Service Information

| FRN Number | Application Number | FRN Nickname | Category of Service | SPIN | Service Provider | Actual Service Start Date | Approved Service Start Date |
|------------|--------------------|-----------------|---------------------|-----------|--------------------------------|---------------------------|-----------------------------|
| 1799102970 | 171045096 | Internet Access | Category 1 | 143035593 | Illinois Fiber Resources Group | 7/1/2017 | |
| 1799102995 | 171045096 | WAN Services | Category 1 | 143030968 | Single Path LLC | 7/1/2017 | |
| 1799103030 | 171045096 | Phone Service | Category 1 | 143004791 | Frontier North, Inc. | 7/1/2017 | |

Original Certifications

- ☐ The Funding Requests listed in this FCC Form 486 have been approved by USAC as shown in my Funding Commitment Decision Letter (FCDL). I have confirmed with the service provider(s) featured in those Funding Requests that these services will start on or before July 31 of the Funding Year.
- ☐ I am providing notification that, as of the date of the start of discounted services, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the schools or libraries represented in the Funding Request Number(s) on this FCC Form 486 will be brought into compliance with the CIPA requirements before the start of the Third Funding Year in which they apply for discounts.
- ☐ I certify that the services listed on this FCC Form 486 have been, are planned to be, or are being provided to all or some of the eligible entities identified in the FCC Form 471 application(s) cited above. I certify that there are signed contracts covering all of the services listed on this FCC Form 486 except for those services provided under tariff or on a month-to-month basis. I certify that I am authorized to submit this receipt of service confirmation on behalf of the above-named Billed Entity; that I have examined this request; and that, to the best of my knowledge, information, and belief, all statements of fact contained herein are true.
- ☐ I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the services receive an appropriate share of benefits from those services. I recognize that I may be audited pursuant to this application and will retain for at least ten years (or whatever retention period is required by the rules in effect at the time of this certification) after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request any and all records, including FCC Forms 479 where required, and, if audited, will make such records available to the Administrator.
- ☐ I certify that as of the date of the start of discounted services: a. the recipient(s) of service represented in the Funding Request Number(s) on this FCC Form 486 has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l).
- ☐ I certify that as of the date of the start of discounted services: Pursuant to the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), the recipient(s) of service represented in the Funding Request Number(s) on this Form 486: (FOR SCHOOLS and FOR LIBRARIES IN THE FIRST FUNDING YEAR FOR PURPOSES OF CIPA) is (are) undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA for the next funding year, but has (have) not completed all requirements of CIPA for this funding year.
- ☐ I certify that as of the date of the start of discounted services: The Children's Internet Protection Act does not apply because the recipient(s) of service represented in the Funding Request Number(s) on this FCC Form 486 is (are) receiving discount services only for telecommunications services.
- ☐ I certify as the Billed Entity for the consortium that the only services that have been approved for discounts under the universal service support mechanism on behalf of eligible members of the consortium are telecommunications services, and therefore the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), do not apply.
- ☐ I certify as the Billed Entity for the consortium that I have collected duly completed and signed FCC Forms 479 from all eligible members of the consortium.
- ☐ I certify that some or all of the eligible consortium members checked FCC Form 479 Item 6d to seek a CIPA Waiver, and upon request from the Administrator I can provide this information.
- ☐ I certify that no eligible consortium members checked FCC Form 479 Item 6d to seek a CIPA Waiver.

FCC Notice Required By The Paperwork Reduction Act (OMB Control Number: 3060-0853)

Part 54 of the Federal Communications Commission's (FCC) rules authorize the FCC to collect the information requested in this form. Responses to the questions herein are required to obtain the benefits sought by this application. Failure to provide all requested information will delay processing or result in the form being returned without action. Information requested by this form will be available for public inspection. The information provided will be used to determine whether approving this request is in the public interest. We have estimated that each response to this collection of information will take 1 hour. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERF, Paperwork Reduction Project (3060-0853), Washington, DC 20554. We will also accept your comments via the Internet if you send them to pra@fcc.gov. Please DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0853.

FCC Form 486

OMB Control No. 3060-0853

December 2013

Approved Certifications

Approved CIPA Certifications

Certification Details

Certified By Amie Wiseman

Certified On 7/11/2018 2:01 PM EDT

PRINT PREVIEW ✓

ATTACHMENT D



FCC Form 486 Notification Letter

Amie Wiseman
AMBOY COMM UNIT SCH DIST 272
11 E HAWLEY ST
AMBOY, IL 61310

7/18/2018

FUNDING YEAR 2017: 7/1/2017 - 6/30/2018
FCC Form 486 Application Number: 114614
Applicant's FCC Form 486 Nickname: 2017-2018 486

This letter is to notify you that the Universal Service Administrative Company (USAC) has received and accepted a certified FCC Form 486, Receipt of Service Confirmation Form, from you. Information about your commitment may have changed. Please review the [FCC Form 486 Notification Letter Report](#) to confirm the information you provided. This information is also being shared with the service provider(s) identified on each Funding Request Number (FRN).

A [guide](#) that provides a definition for each line of the letter report is available in the Reference Area of our website. Complete program information, including invoice deadlines, is also posted on our website. You may also contact our Client Service Bureau toll-free at (888) 203-8100, or by submitting a customer service case in the E-rate Productivity Center (EPC) by selecting "[Contact Us](#)" from the menu in the top right corner of your landing page and describing your issue.

Next steps

Discuss with your service provider whether you would like discounts on your bills or to pay your bills in full and be reimbursed for discounts.

- Applicants invoice USAC before the invoice deadline using the applicant invoice method [FCC Form 472, Billed Entity Applicant Reimbursement (BEAR) Form] for reimbursements of discounts after paying the service provider bills in full.
- Service providers invoice USAC using the service provider invoice method [FCC Form 474, Service Provider Invoice (SPI) Form] after billing applicants for their non-discount portion.

Whichever method you choose, you must pay your non-discount portion, as stated in program rules. Program rules also require that participants maintain all documentation for at least 10 years after last day of the applicable funding year or the service delivery deadline for the funding request, whichever is later.

To appeal this service start date/funding commitment change decision

You may appeal the Service Start Date change(s) and/or funding commitment adjustment(s) indicated in this letter to USAC in EPC within 60 calendar days of the date of this letter. Failure



to meet this deadline will result in automatic dismissal of your appeal. You must file your appeal first with USAC because the FCC Form 486 deadline is a procedural deadline and not a program rule that requires a waiver by the FCC. If USAC denies the appeal, you may then appeal to the FCC.

To file an appeal with USAC, select "Appeal" from the menu in the top right corner of your landing page and then provide the requested information. USAC will reply to your appeal submissions to confirm receipt. Visit the [USAC Schools and Libraries website](#) for more information on submitting an appeal to USAC, including step-by-step instructions.

Schools and Libraries Division
Universal Service Administrative Co.



FCC Form 486 Notification Letter Report:

| | |
|--|------------------------------|
| SPIN (Service Provider Identification Number): | 143030968 |
| Funding Request Number (FRN): | 1799102995 |
| FCC Form 471 Application Number (based on Funding Request Number): | 171045096 |
| Billed Entity Number (BEN): | 135982 |
| Entity Name: | AMBOY COMM UNIT SCH DIST 272 |
| Approved Service Start Date (ASSD): | 3/13/2018 |
| Billing Account Number: | |
| Service Start Date Change Indicator: | N |
| Service Start Date Change Explanation: | 120 DAY VIOLATION |



FCC Form 486 Notification Letter Report:

| | |
|--|------------------------------|
| SPIN (Service Provider Identification Number): | 143035593 |
| Funding Request Number (FRN): | 1799102970 |
| FCC Form 471 Application Number (based on Funding Request Number): | 171045096 |
| Billed Entity Number (BEN): | 135982 |
| Entity Name: | AMBOY COMM UNIT SCH DIST 272 |
| Approved Service Start Date (ASSD): | 3/13/2018 |
| Billing Account Number: | |
| Service Start Date Change Indicator: | N |
| Service Start Date Change Explanation: | 120 DAY VIOLATION |



FCC Form 486 Notification Letter Report:

| | |
|--|------------------------------|
| SPIN (Service Provider Identification Number): | 143004791 |
| Funding Request Number (FRN): | 1799103030 |
| FCC Form 471 Application Number (based on Funding Request Number): | 171045096 |
| Billed Entity Number (BEN): | 135982 |
| Entity Name: | AMBOY COMM UNIT SCH DIST 272 |
| Approved Service Start Date (ASSD): | 3/13/2018 |
| Billing Account Number: | |
| Service Start Date Change Indicator: | N |
| Service Start Date Change Explanation: | 120 DAY VIOLATION |

ATTACHMENT E

[Records](#) / [Appeals](#)

486 Appeal 2017 - #123779

[Summary](#) [Associated FRNs](#) [News](#) [Related Actions](#)



Appeal Information

[View Status \(+\)](#)

Funding Year 2017

Submitting Organization [AMBOY COMM UNIT SCH DIST 272 \(BEN: 135982\)](#)

Created By Amie Wiseman

Created On 9/25/2018 5:48 AM EDT

Main Contact

Name Amie Wiseman

Email awiseman@amboy.net

Phone Number 815-857-2164

Narrative

Amboy School District is appealing USAC violation of 486 late filing and.

Our appeal is based on turn over in with district leadership and roles and responsibility changes with the organization. We hope that your organization can see clear to understand that during this trying time in the district you will recognize that these services were provided to our students to insure the high level of education available to them. Another contributing factor to this is with the change in roles and responsibilities Erate updates and timeline notification were not being received and access to the EPC was difficult to access.

In doing our research to file the appeal we have seen cases which USAC and the FCC have granted a 486 deadline filing waiver for such clerical errors as ours.

We hope you can support us and our students to ensure that our funding is up held to allow us to provide the highest level of education available.

Appeal Details

Decision appealed by applicant FCC Form 486 Notification Letter

If you wish to modify or cancel your appeal, or, if you have any questions about your appeal, please contact the E-rate Program’s Client Service Bureau (CSB) at (888) 203-8100.

[View Supporting Documentation \(+\)](#)

ATTACHMENT F



Recovery of Improperly Disbursed Funds Letter

Daniel Briggs
Single Path LLC
905 Parkview Blvd
Lombard, IL 60148

07/30/2018

Our review of your Schools and Libraries Universal Service Support Program (or E-rate) funding request has determined funds were committed in violation of Federal Communications Commission (FCC) rules. You have 60 days from the date of this letter to appeal the following decision(s). For more detailed information see below.

Total amount to be recovered: \$14,070.00

| FCC Form 471 | FRN | Commitment adjustment | Total amount to be recovered | Explanation(s) | Party to recover from |
|--------------|------------|-----------------------|------------------------------|--|-----------------------|
| 161055664 | 1699129188 | \$0.00 | \$14,070.00 | Funds disbursed are greater than the commitment amount | BEN |

See Attached Adjustment Report for more information on the specific FRNs and Explanations listed above.

Recovery of Improperly Disbursed Funds

Our review of your Universal Service Schools and Libraries Support Program (or E-rate) funding request(s) referenced in the Adjustment Report has determined funds were improperly disbursed in violation of Federal Communications Commission (FCC) rules. A copy of that Adjustment Report is also attached to this letter.

FCC rules require the Universal Service Administrative Company (USAC) to recover funding when it is determined that funding was disbursed in violation of the rules. This letter notifies you that USAC will be recovering funding that was improperly disbursed and provides information on how to appeal this decision.

This is NOT a bill. If disbursed funds need to be recovered, USAC will issue a Demand Payment Letter. The debt referenced in the Demand Payment Letter will be due within 30 days of that letter's date. Failure to pay the debt may result in interest, late payment fees, and administrative charges and will invoke the FCC's "Red Light Rule."

FCC's Red Light Rule

The FCC Red Light Rule requires USAC to dismiss pending FCC Form 471 applications, appeals, and invoices or to net disbursements offsetting the debt if the entity responsible for paying the outstanding debt owed to the FCC has not paid the debt or made satisfactory arrangements to pay the debt within 30 days of the Demand Payment Letter. For information on the Red Light Rule, see

<https://www.fcc.gov/licensing-databases/fees/debt-collection-improvement-act-implementation>.

To Appeal This Decision

If you wish to contest any part of this letter, you must first file an appeal with USAC to seek review of the decision. Parties that have filed an appeal with USAC and received an adverse decision may, if they choose, appeal USAC's decision to the FCC. Parties seeking a waiver of a codified FCC rule should file a request for waiver directly with the FCC because



USAC cannot waive FCC rules. Your appeal to USAC or waiver request to the FCC must be filed within 60 days of the date of this letter.

All appeals filed with USAC must be filed in EPC by selecting "Appeal" from the menu in the top right hand corner of your landing page and providing the requested information.

Your appeal should include the following information. (Because you file the appeal through your EPC account, the system will automatically fill in some of these components for you).

- 1) Name, address, telephone number, and email address for the contact person for this appeal.
- 2) Indicate specifically that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., Recovery of Improperly Disbursed Funds) and the decision you are appealing:
 - a. Appellant name;
 - b. Applicant name and service provider name, if different from appellant;
 - c. Applicant BEN and Service Provider Identification Number (SPIN);
 - d. FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC;
 - e. "Recovery of Improperly Disbursed Funds," AND the exact text of the decision that you are appealing.
- 3) Identify the problem and the reason for the appeal and explain precisely the relief sought. Please keep your appeal to the point, and provide supporting documentation. Be sure to keep a copy of your entire appeal, including any correspondence and documentation. A copy will automatically be saved for you in EPC. USAC will reply to your appeal submission to confirm receipt.

For more information on submitting an appeal to USAC including step by step instructions on how to file the appeal through EPC, please see "Appeals" in the Schools and Libraries section of the USAC website.

As mentioned, parties seeking a waiver of FCC rules or that have filed an appeal with USAC and received a decision may file a request for waiver or appeal USAC's decision to the FCC. Waiver requests or appeals to the FCC must be made within 60 days of the issuance of USAC's decision and include all of the information referenced above for appeals to USAC.

The FCC recommends filing appeals or waiver requests with the Electronic Comment Filing System (ECFS) to ensure timely filing. Electronic waiver requests or appeals will be considered filed on a business day if they are received at any time before 11:59 PM ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193.

For more information about submitting waiver requests or appeals to the FCC, including options to submit the waiver request or appeal via U.S. mail or hand delivery, visit the FCC's website.

Schools and Libraries Division



Adjustment Report

| | |
|----------------------------------|--|
| FCC Form 471 Application Number: | 161055664 |
| Funding Request Number: | 1699129188 |
| Commitment Adjustment: | \$0.00 |
| Total Amount to Be Recovered: | \$14,070.00 |
| Explanation(s): | Funds disbursed are greater than the commitment amount |
| Party to Recover From: | BEN |
| Funding Year: | 2016 |
| Billed Entity Number: | 135982 |
| Services Ordered: | Data Transmission and/or Internet Access |
| Service Provider Name: | Single Path LLC |
| SPIN: | 143030968 |
| Original Funding Commitment: | \$14,070.00 |
| Adjusted Funding Commitment: | \$14,070.00 |
| Funds Disbursed to Date: | \$28,140.00 |

Funding Commitment Adjustment Explanation:

During USACs review, it was determined that funds were improperly disbursed for funding request 1699129188 . Based on an internal review, the funding amount was confirmed to be \$14,070.00 which is less than the amount that was disbursed. Therefore, USAC will seek recovery of \$14,070.00 in improperly disbursed funds from the applicant.